



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Arthur Kroot
The Kroot Corporation
P.O. Box 503
Columbus, Indiana 47202-0503

Re: 005-14705-00018
First Significant Permit Revision to
MSOP 005-11844-00018

Dear Mr. Kroot:

The Kroot Corporation was issued a minor source operating permit on March 12, 2001 for an aluminum scrap sweating source. A letter requesting a revision to this permit was received on August 1, 2001. Pursuant to the provisions of 326 IAC 2-6.1-6 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

On March 23, 2000, the U. S. Environmental Protection Agency (U.S. EPA) issued a National Emission Standard for Hazardous Air Pollutants (NESHAP)(326 IAC 20 and 40 CFR Part 63, Subpart RRR) for the secondary aluminum production source category. The existing sweat furnace (FCE) is subject to the requirements of this rule. This significant permit revision will incorporate the requirements of 40 CFR 63 Subpart RRR into the existing MSOP. Pursuant to 63.1500(f), the source must submit a Part 70 application by December 9, 2005.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised MSOP permit is provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
EAL:MES

cc: File - Bartholomew County
U.S. EPA, Region V
Bartholomew County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Branch - Karen Nowak
Administrative and Development - Lisa Lawrence
Technical Support and Modeling - Michele Boner



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**The Kroot Corporation
2915 State Street
Columbus, Indiana 47202**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 005-11844-00018	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 12, 2001 Expiration Date: March 12, 2006

First Significant Revision No.: 005-14705-00018 Sections Affected: D.1	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emissions Units and Pollution Control Equipment Summary	
B	GENERAL CONSTRUCTION CONDITIONS	5
B.1	Permit No Defense [IC 13]	
B.2	Definitions	
B.3	Effective Date of the Permit [IC 13-15-5-3]	
B.4	Modification to Permit [326 IAC 2]	
C	SOURCE OPERATION CONDITIONS	6
C.1	PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]	
C.2	Hazardous Air Pollutants (HAPs) [326 IAC 2-7]	
C.3	Preventive Maintenance Plan [326 IAC 1-6-3]	
C.4	Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]	
C.5	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]	
C.6	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
C.7	Permit Revocation [326 IAC 2-1-9]	
C.8	Opacity [326 IAC 5-1]	
C.9	Fugitive Dust Emissions [326 IAC 6-4]	
C.10	Stack Height [326 IAC 1-7]	
C.11	Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]	
C.12	Compliance Monitoring [326 IAC 2-1.1-11]	
C.13	Monitoring Methods [326 IAC 3]	
C.14	Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]	
C.15	Actions Related to Noncompliance Demonstrated by a Stack Test	
	Record Keeping and Reporting Requirements	
C.16	Malfunctions Report [326 IAC 1-6-2]	
C.17	Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]	
C.18	General Record Keeping Requirements [326 IAC 2-6.1-2]	
C.19	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	
C.20	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
D.1	EMISSIONS UNIT OPERATION CONDITIONS: Sweat furnace with Afterburner	15
	Emission Limitations and Standards [326 IAC 2-6.1-5(1)]	
D.1.1	General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]	
D.1.2	Particulate Matter (PM) [326 IAC 6-3-2(c)]	
D.1.3	Sweat Furnace Dioxin/Furan Emission Limitation [40 CFR 63.1505(f)]	
D.1.4	Sweat Furnace Operation [40 CFR 63.1506(a)]	
D.1.5	Preventive Maintenance Plan [326 IAC 1-6-3]	
	Compliance Determination Requirements [326 IAC 2-1.1-11]	
D.1.6	Particulate Matter (PM) and Dioxin/Furans (D/F)	
D.1.7	Afterburner Operation [40 CFR 63.1506(h)]	
D.1.8	Testing Requirements [326 IAC 3-6]	
	Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]	
D.1.9	Visible Emissions Notations	
D.1.10	Afterburner	
D.1.11	Monitoring Devices [40 CFR 63.1510(g)]	

- D.1.12 Performance Evaluation [40 CFR 63.1512(m)][40 CFR 63.8]
- D.1.13 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR 63.1510(b)]
- D.1.14 Parametric Monitoring
- D.1.15 Afterburner Inspections [40 CFR 63.1510(g)]

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.1.16 Record Keeping Requirements
- D.1.17 Reporting Requirements for Subpart RRR [40 CFR 63.6][40 CFR 63.10][40 CFR 63.1516]
- D.1.18 Notifications [40 CFR 63.9][40 CFR 63.1515]

Malfunction Report	23
Annual Notification	25

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary aluminum scrap sweating source.

Authorized Individual: Arthur Kroot
Source Address: 2915 State Street, Columbus, Indiana 47202
Mailing Address: PO Box 503, Columbus, Indiana 47202-0503
Phone Number: 812-372-8203
SIC Code: 3341
County Location: Bartholomew
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act
1 of 28 Listed Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

One (1) natural gas fired sweat furnace, identified as FCE, installed in 1974, equipped with an afterburner and exhausting to stack S1, capacity: 20.6 million British thermal units per hour and 3,000 pounds of scrap per hour.

SECTION B

GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potentials to emit of PM, PM₁₀, SO₂, VOC, NO_x and CO are each less than one hundred (100) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit of PM₁₀, SO₂, VOC, NO_x or CO to 100 tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to one hundred (100) tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-7]

Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.

- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.8 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.9 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.10 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements

C.11 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

- (a) Compliance testing on new emissions units shall be conducted within sixty (60) days after achieving maximum production rate, but no later than one hundred eighty (180) days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.19 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.20 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) natural gas fired sweat furnace, identified as FCE, installed in 1974, equipped with an afterburner and exhausting to Stack S1, capacity: 20.6 million British thermal units per hour and 3,000 pounds of scrap per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart RRR.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the one (1) sweat furnace FCE shall not exceed 5.38 pounds per hour when operating at a process weight rate of 3,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Sweat Furnace Dioxin/Furan Emission Limitation [40 CFR 63.1505(f)]

Pursuant to 40 CFR 63.1505(f)(2), the Permittee shall not discharge or cause to be discharged to the atmosphere, dioxin/furan emissions from the one (1) sweat furnace (FCE) in excess of 3.5×10^{-10} grains per dry standard cubic foot (gr/dscf) TEQ at eleven percent (11%) oxygen (O_2).

D.1.4 Sweat Furnace Operation [40 CFR 63.1506(a)]

The Permittee shall operate the one (1) sweat furnace (FCE) and afterburner according to the requirements of 40 CFR 63, Subpart RRR, and this permit.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.6 Particulate Matter (PM) and Dioxin/Furans (D/F)

The afterburner for PM and dioxin/furan control shall be in operation at all times when the one (1) sweat furnace FCE is in operation.

D.1.7 Afterburner Operation [40 CFR 63.1506(h)]

In order to demonstrate compliance with Condition D.1.3:

- (a) the Permittee shall maintain the 3-hour block average operating temperature of the afterburner at or above 1,600 degrees Fahrenheit (°F);
- (b) the afterburner shall have a design residence time of two (2) seconds or greater; and
- (c) the afterburner shall be operated in accordance with the Operation, Maintenance, and Monitoring (OM&M) Plan.

Pursuant to 40 CFR 63.1505(f)(1), satisfying the requirements of this condition shall be sufficient to demonstrate compliance with the dioxin/furan limit in Condition D.1.3.

D.1.8 Testing Requirements [326 IAC 3-6]

Within 180 days after issuance of this permit, the Permittee shall perform PM testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and one half (2½) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of the one (1) sweat furnace FCE and afterburner stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.10 Afterburner

When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,600 degrees Fahrenheit (°F).

D.1.11 Monitoring Devices [40 CFR 63.1510(g)]

The Permittee shall install an afterburner temperature monitoring device at the exit of each afterburner's combustion zone. The temperature monitoring device shall have a recorder response range including zero and 1.5 times the average temperature established according to the requirements in 63.1512(m), and shall be:

- (a) designed, installed, and calibrated according to the manufacturer's specifications; and
- (b) maintained according to the manufacturer's instructions for short and long term maintenance, with each monitoring device operating parameter value or range being the value or range established during the performance evaluation required in Condition D.1.12.

The Permittee shall also meet all other applicable continuous monitoring system requirements of 40 CFR 63, Subpart A.

D.1.12 Performance Evaluation [40 CFR 63.1512(m)][40 CFR 63.8]

The owner or operator shall conduct a performance evaluation of each temperature monitoring device to establish an operating parameter value or range for the required afterburner temperature of 1600 °F.

The performance evaluations shall be conducted according to the requirements of 40 CFR 63.8 and Section C - Performance Testing - of this permit, and shall be performed after issuance of this permit, with the test results submitted as part of the Notification of Compliance Status Report, as specified in Condition D.1.18(b). The tests shall be conducted utilizing the specified methods of Subpart RRR and/or alternative methods as approved by the Office of Air Quality.

D.1.13 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR 63.1510(b)]

The Permittee shall, for the one (1) sweat furnace (FCE), prepare and implement a written operation, maintenance, and monitoring (OM&M) plan.

The OM&M plan shall be implemented at startup, but need only be submitted to the Office of Air Quality (OAQ) for review and approval as part of the Part 70 or Part 71 permit application required to be submitted by December 9, 2005. The OM&M shall include, at a minimum, the following requirements:

- (a) for the one (1) sweat furnace and afterburner, the operating parameters to be monitored to determine compliance, and any applicable established operating levels or ranges;
- (b) a monitoring schedule for the one (1) sweat furnace;
- (c) a list of the procedures for the proper operation and maintenance of the one (1) sweat furnace and afterburner
- (d) a list of the procedures for the proper operation and maintenance of the monitoring devices or systems used to determine compliance, including:
 - (1) the procedures for calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
 - (2) the procedures for the quality control and quality assurance of the required continuous emission monitoring system as required by the general provisions in 40 CFR 63, Subpart A;
- (e) a list of the procedures for monitoring the process and control device parameters, including procedures for annual inspections of the afterburner;
- (f) a list of the corrective actions to be taken when the sweat furnace operating parameters or the afterburner parameters deviate from the value or range established in paragraph (a) of this Condition, including:
 - (1) the procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
 - (2) the procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed; and

- (g) a maintenance schedule for the one (1) sweat furnace (FCE) and afterburner that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

All subsequent proposed changes to the plan shall be submitted to the Office of Air Quality (OAQ) for review and approval, and shall include, at a minimum, the most recent updated information requested in (a) through (g) of this condition. Pending approval by the OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the most recent existing approved plan.

D.1.14 Parametric Monitoring

- (a) The Permittee shall install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems in 40 CFR 63, Subpart A.
- (b) The Permittee shall record the afterburner operating temperature in 15-minute block averages, and shall determine and record 3-hour block averages.
- (c) When for any one reading, the afterburner temperature is less than 1,600 degrees Fahrenheit (°F), the Permittee shall take reasonable response steps in accordance with Section C- Compliance Monitoring Plan - Failure to Take Response Steps. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.15 Afterburner Inspections [40 CFR 63.1510(g)]

An annual inspection of the afterburner controlling the one (1) sweat furnace (FCE) shall be performed according to the requirements of 40 CFR 63.1510(g)(3). Following the inspection, all necessary repairs shall be completed in accordance with the requirements of the OM&M plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.16 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the PM emission limit established in Condition D.1.2.
 - (1) A log of the dates of use;
 - (2) The temperature records for the afterburner and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of the 15-minute block average afterburner operating temperature, including any period when the average temperature in any 3-hour block period falls below 1,600 degrees Fahrenheit (°F), with a brief explanation of the cause of the excursion and the corrective actions taken.
- (c) To document compliance with Condition D.1.15, the Permittee shall maintain records of the results of the inspections required under Condition D.1.15.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (e) To document compliance with Condition D.1.9, the Permittee shall maintain records of

visible emission notations of the sweat furnace and afterburner stack exhaust once per shift.

D.1.17 Reporting Requirements for Subpart RRR [40 CFR 63.6][40 CFR 63.10][40 CFR 63.1516]

Pursuant to 40 CFR 63.1516, the following reporting requirements apply to the one (1) sweat furnace (FCE) and afterburner:

(a) Startup, Shutdown, and Malfunction Plan/Reports:

The Permittee shall develop and implement a written plan as described in Sec. 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard.

The Permittee shall also keep records of each event as required by Sec. 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in Sec. 63.6(e)(3).

In addition to the information required in Sec. 63.6(e)(3), the plan shall include:

- (1) procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
- (2) corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

(b) Excess Emissions/Summary Report:

As required by Sec. 63.10(e)(3), the Permittee shall submit semiannual reports within 60 days after the end of each 6-month period. Each report shall contain the information specified in Sec. 63.10(c). When no deviations of parameters have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period.

- (1) A report shall be submitted if any of these conditions occur during a 6-month reporting period:
 - (A) an excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
 - (B) an action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in Sec. 63.6(e)(3).
 - (C) the one (1) sweat furnace (FCE) was not operated according to the requirements of 40 CFR 63, Subpart RRR.
- (2) The Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(c) Annual Compliance Certifications:

For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the Permittee shall certify continuing compliance based upon, but not limited to, the following conditions:

- (1) Any period of excess emissions, as defined in (b) of this Condition, that occurred during the year were reported as required by this subpart; and
- (2) All monitoring, record keeping, and reporting requirements were met during the year.

D.1.18 Notifications [40 CFR 63.9][40 CFR 63.1515]

Pursuant to 40 CFR 63.1515, the following notification requirements apply to a source subject to 40 CFR 63, Subpart RRR:

(a) Initial Notifications:

The Permittee shall submit initial notifications to the Office of Air Quality as follows:

- (1) As required by 63.9(b)(1), the Permittee shall notify the Office of Air Quality of any existing minor source that is modified such that it becomes a major source subject to Subpart RRR.
- (2) As required by 63.9(b)(3), the Permittee shall notify the Office of Air Quality of any new minor affected source, reconstructed affected source, or source that has been reconstructed such that it becomes an affected source. The notification shall include a statement that the source is subject to Subpart RRR.
- (3) As required by 63.9(b)(4), the Permittee shall, for any new major affected source or reconstructed major affected source, provide the following notifications:
 - (A) notification of intention to construct a new major affected source, reconstruct a major source, or reconstruct a major source such that the source becomes a major affected source;
 - (B) notification of the date when construction or reconstruction was commenced, no later than 30 days after the date construction or reconstruction commenced;
 - (C) notification of the anticipated date of startup; and
 - (D) notification of the actual date of startup.
- (4) As required by 63.9(b)(5), any Permittee who intends to construct a new affected source or reconstruct an affected source subject to this subpart, or reconstruct a source such that it becomes an affected source subject to this subpart, shall provide notification of the intended construction or reconstruction. The notification shall include all the information required for an application for approval of construction or reconstruction, as required by 63.5(d).

For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.

The application shall be submitted as follows:

- (A) the application shall be submitted as soon as practicable before the construction or reconstruction is planned to commence, but no sooner than the effective date of Subpart RRR; or
 - (B) the application shall be submitted as soon as practicable before startup but no later than 90 days after the effective date of this subpart if the construction or reconstruction had commenced and initial startup had not occurred before the effective date.
- (5) As required by 63.9(d), the Permittee shall provide notification of any special compliance obligations for a new source.
 - (6) As required by 63.9(e) and (f), the Permittee shall, if required, provide notification to the Office of Air Quality, of the anticipated date for conducting performance tests and visible emission observations. Notification of the intent to conduct a performance test shall be submitted at least 60 days before the performance test is scheduled. Notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
 - (7) As required by 63.9(g), the Permittee shall provide additional notifications for sources with continuous emission monitoring systems or continuous opacity monitoring systems.
- (b) Notification of Compliance Status Report:

The Permittee shall submit a notification of compliance status report to the Office of Air Quality and US EPA, Region V within 60 days after March 24, 2003. The notification of compliance status report shall include the information specified in this Condition, and shall be signed by the responsible official who shall certify its accuracy.

The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination.

For the notification of compliance status report to be deemed complete, the Permittee shall submit, at a minimum, the following information:

- (1) all information required in Sec. 63.9(h).
- (2) the approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system).
- (3) the compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.
- (4) design information and analysis, with supporting documentation, demonstrating

conformance with the requirements for capture/collection systems in Sec. 63.1506(c).

- (5) manufacturer's specification or analysis documenting the design residence time of no less than 2 seconds and design operating temperature of no less than 1,600 °F for the afterburner controlling the one (1) sweat furnace (FCE).
- (6) approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).
- (7) startup, shutdown, and malfunction plan, with revisions.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. : _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

* **Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	The Kroot Corporation
Address:	2915 State Street
City:	Columbus, Indiana 47202
Phone #:	812-372-8203
MSOP #:	005-11844-00018

I hereby certify that The Kroot Corporation is ☒ still in operation.
☐ no longer in operation.

I hereby certify that The Kroot Corporation is ☒ in compliance with the requirements of MSOP **005-11844-00018**.
☐ not in compliance with the requirements of MSOP **005-11844-00018**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Revision to a Minor Source Operating Permit (MSOP)

Source Name:	The Kroot Corporation
Source Location:	2915 State Street, Columbus, Indiana 47201
County:	Bartholomew
SIC Code:	3341
Operation Permit No.:	MSOP 005-11844-00018
Significant Permit Revision No.:	SPR 005-14705-00018
Permit Reviewer:	Edward A. Longenberger

On January 30, 2003, the Office of Air Quality (OAQ) had a notice published in the Republic, Columbus, Indiana, stating that The Kroot Corporation had applied for a Significant Permit Revision to a Minor Source Operating Permit (MSOP) to operate a sweat furnace with an afterburner. The notice also stated that OAQ proposed to issue a Significant Permit Revision for this operation and provided information on how the public could review the proposed Significant Permit Revision and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Revision should be issued as proposed.

On January 30, 2003, Charles A. Licht, P.E., of CLEA, a consultant for the applicant, submitted comments on the proposed Significant Minor Permit Revision to an MSOP. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

I am at a loss to understand why IDEM decided that a revision to the Minor Source Operating Permit was necessary. Please explain why a Part 70 permit will be required.

Response 1:

The permit revision was necessary to incorporate the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart RRR (Secondary Aluminum Production) into the operating permit. The requirement to submit a Part 70 permit application by December 9, 2005 is pursuant to 40 CFR 63.1500(f) of the NESHAP. No change to the permit was made as a result of this comment.

Comment 2:

I note reference is made to 40 CFR 63.1505(f)(2). In fact the furnace qualified under 63.1505(f)(1). This latter section does NOT require investigation of D/F.

Response 2:

The sweat furnace is subject to the requirements of 40 CFR 63.1505(f)(2), which states that dioxin/furan emissions from the one (1) sweat furnace (FCE) shall not exceed 3.5×10^{-10} grains per dry standard cubic foot (gr/dscf) TEQ at eleven percent (11%) oxygen (O_2). The furnace does qualify under 40 CFR 63.1505(f)(1), and therefore The Kroot Corporation is not required to conduct a performance test to demonstrate compliance with the dioxin/furan limit. The emission limitation

still applies, but the U.S. EPA has determined that operation of an afterburner with a design residence time of 0.8 seconds and at a temperature of 1,600 deg. F will ensure compliance with the dioxin/furan limit. No change to the permit was made as a result of this comment.

Comment 3:

We have asked for the operating hours to be limited which has not been done in either the original permit nor the revision. Kroot only wants to operate less than 5,000 hours per year, this reduces potential emissions by 60%. Why was this omitted from the permit?

Response 3:

Kroot may operate less than 5,000 hours per year without IDEM, OAQ approval. In this case, imposing a formal limit on hours of operation and/or annual throughput does not serve any practical purpose. The limit would not change the source's permitting level, nor would it affect the applicability of any state or federal air pollution rules. In fact, the only noticeable change would be the additional record keeping and reporting requirements that would accompany such a limit. No change to the permit was made as a result of this comment.

Comment 4:

In your Section D.1.8 you require testing. According to the U.S. EPA rules, so long as the afterburner is operated about 1600EF, there is no requirement for stack testing. Nonetheless stack testing was done in 2001. A copy of the test results should be in your files.

Response 4:

Condition D.1.8 (Testing Requirements) is an existing condition that was included in the original MSOP. This condition is required to demonstrate compliance with the particulate emission limitation prescribed by the state rule 326 IAC 6-3-2, and also serves to verify the alternate PM emission factor that was used in the original MSOP. The U.S. EPA is referring to 40 CFR 63.1505(f)(1), which states that by operating the afterburner at 1,600 deg. F (and with a design residence time of 0.8 seconds), the source does not need to perform stack testing to demonstrate compliance with the dioxin/furan limit required by 40 CFR 63, Subpart RRR for sweat furnaces. No change to the permit was made as a result of this comment.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit

Source Background and Description

Source Name:	The Kroot Corporation
Source Location:	2915 State Street, Columbus, Indiana 47201
County:	Bartholomew
SIC Code:	3341
Operation Permit No.:	MSOP 005-11844-00018
Operation Permit Issuance Date:	March 12, 2001
Significant Permit Revision No.:	SPR 005-14705-00018
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a revision application from The Kroot Corporation relating to the National Emission Standard for Hazardous Air Pollutants (NESHAP)(326 IAC 20 and 40 CFR Part 63, Subpart RRR) for the secondary aluminum production source category.

History

On March 12, 2001, The Kroot Corporation was issued a Minor Source Operating Permit (MSOP 005-11844-00018) for an aluminum scrap sweating source. The emission unit associated with the source is one (1) natural gas fired sweat furnace, identified as FCE, installed in 1974, equipped with an afterburner and exhausting to Stack S1, with a capacity of 20.6 million British thermal units per hour and 3,000 pounds of scrap per hour.

The unrestricted potential to emit of the worst case Part 70 criteria pollutant (PM₁₀) was determined to be 88.1 tons per year. The unrestricted potential to emit of the worst case single Hazardous Air Pollutant (HAP) was determined to be less than ten (10) tons per year, and the unrestricted potential to emit a combination of all HAPs was determined to be less than twenty-five (25) tons per year.

On March 23, 2000, the U.S. Environmental Protection Agency (U.S. EPA) issued a National Emission Standard for Hazardous Air Pollutants (NESHAP)(326 IAC 20 and 40 CFR Part 63, Subpart RRR) for the secondary aluminum production source category. The existing sweat furnace (FCE) is subject to the requirements of this rule.

40 CFR Part 63, Subpart RRR, states that sources that are subject to the requirements of Subpart RRR are subject to the Title V permitting requirements under 40 CFR parts 70 and 71, as applicable. This rule also grants the IDEM, OAQ, the power to defer the requirement to submit a Title V permit application until December 9, 2005, provided that the affected units are not located at a major source under 40 CFR 63.2 (single and combined HAP emissions greater than ten (10) and twenty-five (25) tons per year, respectively) and the source is not otherwise required to obtain a Title V permit.

The Kroot Corporation is not a major source under 40 CFR 63.2, and is not otherwise required to obtain a Title V permit. Therefore, The Kroot Corporation shall submit a Part 70 application by December 9, 2005.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the MSOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 1, 2001.

Justification for Revision

The MSOP is being revised through a MSOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-6.1-6(i), because as a result of this modification, the source will need to obtain a Part 70 permit under 326 IAC 2-7. Pursuant to 63.1500(f), the source must submit a Part 70 application by December 9, 2005.

Federal Rule Applicability

Pursuant to 40 CFR 63.1500(c)(3), the one (1) natural gas fired sweat furnace, identified as FCE, installed in 1974, equipped with an afterburner and exhausting to Stack S1, with a capacity of 20.6 million British thermal units per hour and 3,000 pounds of scrap per hour, is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart RRR. The one (1) sweat furnace (FCE) is subject to Subpart RRR because it is a sweat furnace located at a secondary aluminum production facility that is an area source of HAPs pursuant to 40 CFR 63.2.

The one (1) sweat furnace (FCE) is subject to the requirements of Subpart RRR pertaining to dioxin and furan (D/F) emissions, and the associated operating, monitoring, reporting and record keeping requirements. The Permittee must comply with the requirements of Subpart RRR by March 24, 2003. A summary of the requirements is as follows:

- (a) The provisions of 40 CFR Part 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the one (1) sweat furnace (FCE) except when otherwise specified in 40 CFR Part 63 Subpart RRR.
- (b) Pursuant to 40 CFR 63.1505(f)(2), the Permittee shall not discharge or cause to be discharged to the atmosphere, dioxin/furan emissions from the one (1) sweat furnace (FCE) in excess of 3.5×10^{-10} grains per dry standard cubic foot (gr/dscf) TEQ at eleven percent (11%) oxygen (O_2).
- (c) An operations, malfunction, and maintenance plan (OM&M) shall be developed for the one (1) sweat furnace (FCE).
- (d) On and after March 24, 2003, the Permittee shall:
 - (1) Maintain the 3-hour block average operating temperature of the afterburner at or above 1,600 degrees Fahrenheit ($^{\circ}F$), and the afterburner meets the specifications of 40 CFR 63.1505(f)(1) by having a design residence time of 0.8 seconds or

greater.

- (2) Operate the afterburner in accordance with the operation, maintenance and monitoring (OM&M) plan.
- (e) The Permittee shall install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems in 40 CFR 63, Subpart A. The Permittee shall record the afterburner operating temperature in 15-minute block averages, and shall determine and record 3-hour block averages.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) natural gas fired sweat furnace, identified as FCE, installed in 1974, equipped with an afterburner and exhausting to Stack S1, capacity: 20.6 million British thermal units per hour and 3,000 pounds of scrap per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart RRR.

D.1.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the one (1) sweat furnace FCE shall not exceed 5.38 pounds per hour when operating at a process weight rate of 3000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.1.3 Sweat Furnace Dioxin/Furan Emission Limitation [40 CFR 63.1505(f)]

Pursuant to 40 CFR 63.1505(f)(2), the Permittee shall not discharge or cause to be discharged to the atmosphere, dioxin/furan emissions from the one (1) sweat furnace (FCE) in excess of 3.5×10^{-10} grains per dry standard cubic foot (gr/dscf) TEQ at eleven percent (11%) oxygen (O_2).

D.1.4 Sweat Furnace Operation [40 CFR 63.1506(a)]

The Permittee shall operate the one (1) sweat furnace (FCE) and afterburner according to the requirements of 40 CFR 63, Subpart RRR, and this permit.

D.1.25 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.36 Particulate Matter (PM) and Dioxin/Furans (D/F)

The afterburner for PM **and dioxin/furan** control shall be in operation at all times when the one (1) sweat furnace FCE is in operation.

D.1.7 Afterburner Operation [40 CFR 63.1506(h)]

In order to demonstrate compliance with Condition D.1.3:

- (a) the Permittee shall maintain the 3-hour block average operating temperature of the afterburner at or above 1,600 degrees Fahrenheit (°F);**
- (b) the afterburner shall have a design residence time of 0.8 seconds or greater; and**
- (c) the afterburner shall be operated in accordance with the Operation, Maintenance, and Monitoring (OM&M) Plan.**

Pursuant to 40 CFR 63.1505(f)(1), compliance with the requirements of this condition shall be sufficient to demonstrate compliance with the dioxin/furan limit in Condition D.1.3.

D.1.48 Testing Requirements [326 IAC 3-6]

Within 180 days after issuance of this permit, the Permittee shall perform PM testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and one half (2½) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.59 Visible Emissions Notations

- (a) Visible emission notations of the one (1) sweat furnace FCE and afterburner stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.610Afterburner

When operating, the thermal incinerator shall maintain a minimum operating temperature of **1,600 degrees Fahrenheit (°F)**. ~~1400°F during operation until a temperature has been determined from the most recent compliant stack test, as approved by IDEM.~~

D.1.11 Monitoring Devices [40 CFR 63.1510(g)]

The Permittee shall install an afterburner temperature monitoring device at the exit of each afterburner's combustion zone. The temperature monitoring device shall have a recorder response range including zero and 1.5 times the average temperature established according to the requirements in 63.1512(m), and shall be:

- (a) designed, installed, and calibrated according to the manufacturer's specifications; and
- (b) maintained according to the manufacturer's instructions for short and long term maintenance, with each monitoring device operating parameter value or range being the value or range established during the performance evaluation required in Condition D.1.12.

The Permittee shall also meet all other applicable continuous monitoring system requirements of 40 CFR 63, Subpart A.

D.1.12 Performance Evaluation [40 CFR 63.1512(m)][40 CFR 63.8]

Pursuant to 40 CFR 63.1512(m), the Permittee shall conduct a performance evaluation of each temperature monitoring device to establish an operating parameter value or range for the required afterburner temperature of 1,600 °F.

The performance evaluations shall be conducted according to the requirements of 40 CFR 63.8 and Section C - Performance Testing - of this permit, and shall be performed after issuance of this permit, with the test results submitted as part of the Notification of Compliance Status Report, as specified in Condition D.1.18(b). The tests shall be conducted utilizing the specified methods of Subpart RRR and/or alternative methods as approved by the Office of Air Quality.

D.1.13 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR 63.1510(b)]

The Permittee shall, for the one (1) sweat furnace (FCE), prepare and implement a written operation, maintenance, and monitoring (OM&M) plan.

The OM&M plan shall be implemented at startup, but need only be submitted to the Office of Air Quality (OAQ) for review and approval as part of the Part 70 or Part 71 permit application required to be submitted by December 9, 2005. The OM&M shall include, at a minimum, the following requirements:

- (a) for the one (1) sweat furnace and afterburner, the operating parameters to be monitored to determine compliance, and any applicable established operating levels or ranges;
- (b) a monitoring schedule for the one (1) sweat furnace;

- (c) a list of the procedures for the proper operation and maintenance of the one (1) sweat furnace and afterburner
- (d) a list of the procedures for the proper operation and maintenance of the monitoring devices or systems used to determine compliance, including:
 - (1) the procedures for calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; and
 - (2) the procedures for the quality control and quality assurance of the required continuous emission monitoring system as required by the general provisions in 40 CFR 63, Subpart A;
- (e) a list of the procedures for monitoring the process and control device parameters, including procedures for annual inspections of the afterburner;
- (f) a list of the corrective actions to be taken when the sweat furnace operating parameters or the afterburner parameters deviate from the value or range established in paragraph (a) of this Condition, including:
 - (1) the procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
 - (2) the procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed; and
- (g) a maintenance schedule for the one (1) sweat furnace (FCE) and afterburner that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

All subsequent proposed changes to the plan shall be submitted to the Office of Air Quality (OAQ) for review and approval, and shall include, at a minimum, the most recent updated information requested in (a) through (g) of this condition. Pending approval by the OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the most recent existing approved plan.

D.1.714 Parametric Monitoring

- (a) ~~The temperature of the afterburner oxidizing zone shall be observed once per shift when the afterburner is in operation. This temperature shall be recorded, and shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.~~

The Permittee shall install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems in 40 CFR 63, Subpart A.

- (b) The Permittee shall record the afterburner operating temperature in 15-minute block averages, and shall determine and record 3-hour block averages.
- ~~(b)~~(c) When for any one reading, the afterburner temperature is less than 1,600 degrees Fahrenheit (°F), the Permittee shall take reasonable response steps in accordance with

Section C- Compliance Monitoring Plan - Failure to Take Response Steps. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.15 Afterburner Inspections [40 CFR 63.1510(g)]

An annual inspection of the afterburner controlling the one (1) sweat furnace (FCE) shall be performed according to the requirements of 40 CFR 63.1510(g)(3). Following the inspection, all necessary repairs shall be completed in accordance with the requirements of the OM&M plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.816 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.42, ~~D.1.6~~ and D.1.7, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the PM emission limit established in Condition D.1.42.
 - (1) A log of the dates of use;
 - (2) The temperature records for the afterburner and the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of the 15-minute block average afterburner operating temperature, including any period when the average temperature in any 3-hour block period falls below 1,600 degrees Fahrenheit (°F), with a brief explanation of the cause of the excursion and the corrective actions taken.
- (c) To document compliance with Condition D.1.15, the Permittee shall maintain records of the results of the inspections required under Condition D.1.15.
- (b)(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (e)(e) To document compliance with Condition D.1.59, the Permittee shall maintain records of visible emission notations of the sweat furnace and afterburner stack exhaust once per shift.

D.1.17 Reporting Requirements for Subpart RRR [40 CFR 63.6][40 CFR 63.10][40 CFR 63.1516]

Pursuant to 40 CFR 63.1516, the following reporting requirements apply to the one (1) sweat furnace (FCE) and afterburner:

- (a) **Startup, Shutdown, and Malfunction Plan/Reports:**

The Permittee shall develop and implement a written plan as described in Sec. 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard.

The Permittee shall also keep records of each event as required by Sec. 63.10(b) and

record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in Sec. 63.6(e)(3).

In addition to the information required in Sec. 63.6(e)(3), the plan shall include:

- (1) procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and**
- (2) corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.**

(b) Excess Emissions/Summary Report:

As required by Sec. 63.10(e)(3), the Permittee shall submit semiannual reports within 60 days after the end of each 6-month period. Each report shall contain the information specified in Sec. 63.10(c). When no deviations of parameters have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period.

- (1) A report shall be submitted if any of these conditions occur during a 6-month reporting period:**
 - (A) an excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).**
 - (B) an action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in Sec. 63.6(e)(3).**
 - (C) the one (1) sweat furnace (FCE) was not operated according to the requirements of 40 CFR 63, Subpart RRR.**
- (2) The Permittee shall submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.**

(c) Annual Compliance Certifications:

For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the Permittee shall certify continuing compliance based upon, but not limited to, the following conditions:

- (1) Any period of excess emissions, as defined in (b) of this Condition, that occurred during the year were reported as required by this subpart; and**
- (2) All monitoring, record keeping, and reporting requirements were met during**

the year.

D.1.18 Notifications [40 CFR 63.9][40 CFR 63.1515]

Pursuant to 40 CFR 63.1515, the following notification requirements apply to a source subject to 40 CFR 63, Subpart RRR:

(a) Initial Notifications:

The Permittee shall submit initial notifications to the Office of Air Quality as follows:

- (1) As required by 63.9(b)(1), the Permittee shall notify the Office of Air Quality of any existing minor source that is modified such that it becomes a major source subject to Subpart RRR.**
- (2) As required by 63.9(b)(3), the Permittee shall notify the Office of Air Quality of any new minor affected source, reconstructed affected source, or source that has been reconstructed such that it becomes an affected source. The notification shall include a statement that the source is subject to Subpart RRR.**
- (3) As required by 63.9(b)(4), the Permittee shall, for any new major affected source or reconstructed major affected source, provide the following notifications:**
 - (A) notification of intention to construct a new major affected source, reconstruct a major source, or reconstruct a major source such that the source becomes a major affected source;**
 - (B) notification of the date when construction or reconstruction was commenced, no later than 30 days after the date construction or reconstruction commenced;**
 - (C) notification of the anticipated date of startup; and**
 - (D) notification of the actual date of startup.**
- (4) As required by 63.9(b)(5), any Permittee who intends to construct a new affected source or reconstruct an affected source subject to this subpart, or reconstruct a source such that it becomes an affected source subject to this subpart, shall provide notification of the intended construction or reconstruction. The notification shall include all the information required for an application for approval of construction or reconstruction, as required by 63.5(d).**

For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.

The application shall be submitted as follows:

- (A) the application shall be submitted as soon as practicable before the construction or reconstruction is planned to commence, but no sooner than the effective date of Subpart RRR; or**

- (B) the application shall be submitted as soon as practicable before startup but no later than 90 days after the effective date of this subpart if the construction or reconstruction had commenced and initial startup had not occurred before the effective date.**
- (5) As required by 63.9(d), the Permittee shall provide notification of any special compliance obligations for a new source.**
- (6) As required by 63.9(e) and (f), the Permittee shall, if required, provide notification to the Office of Air Quality, of the anticipated date for conducting performance tests and visible emission observations. Notification of the intent to conduct a performance test shall be submitted at least 60 days before the performance test is scheduled. Notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.**
- (7) As required by 63.9(g), the Permittee shall provide additional notifications for sources with continuous emission monitoring systems or continuous opacity monitoring systems.**

(b) Notification of Compliance Status Report:

The Permittee shall submit a notification of compliance status report to the Office of Air Quality and US EPA, Region V within 60 days after March 24, 2003. The notification of compliance status report shall include the information specified in this Condition, and shall be signed by the responsible official who shall certify its accuracy.

The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination.

For the notification of compliance status report to be deemed complete, the Permittee shall submit, at a minimum, the following information:

- (1) all information required in Sec. 63.9(h).**
- (2) the approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system).**
- (3) the compliant operating parameter value or range established for each affected source or emission unit with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.**
- (4) design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in Sec. 63.1506(c).**

- (5) **manufacturer's specification or analysis documenting the design residence time of no less than 0.8 seconds and design operating temperature of no less than 1,600 °F for the afterburner controlling the one (1) sweat furnace (FCE).**
- (6) **approved OM&M plan (including site-specific monitoring plan for each group 1 furnace with no add-on air pollution control device).**
- (7) **startup, shutdown, and malfunction plan, with revisions.**

Conclusion

This proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. **005-14705-00018**.